



April 25, 2003

Jerry Marquez  
Flathead Valley Community College  
Libby, MT 59923

Dear Mr. Marquez:

This letter is a follow up to your recent inquiry regarding demolition of the vacant building located at 1022 California. While EPA did perform some pilot vermiculite insulation removal and cleanup in the building, it is not completely clean. We removed most of the bulk insulation from the attic but did not "detail" the attic to remove all remnants of insulation, nor did we apply encapsulant to the plywood when complete. Only when these steps are complete is the attic safe for continual use. This means that some residual Libby asbestos remains in the attic. Some insulation may be present in walls as well.

Based on our current cleanup schedule, it appears you have two options.

1. EPA can demolish the building. EPA has committed to demolition of the building, but unfortunately due to the amount of time and resources this would require, we cannot perform this work until later this summer. I realize that there is a need for demolition to occur as soon as possible and I am sorry for any inconvenience our schedule may cause, but unfortunately we cannot accommodate all circumstances. This is the safest route because we can readily employ protective measures for our workers.
2. You may demolish the building, or have it demolished, at your convenience. There are no regulatory restrictions that prevent you from taking the action. However, you must recognize that demolition of the building in its current state will likely cause some asbestos exposure to those performing the work. EPA generally cautions homeowners that must work with vermiculite insulation or other asbestos containing materials to employ a certified abatement firm or, at a minimum, wear HEPA filter equipped respirators and clean the disturbed area with a HEPA vacuum when complete. To help alleviate this potential exposure, EPA can remove the remainder of the bulk insulation from the property in the next few weeks. This would likely take only a couple days and limited EPA resources, whereas cleanup and demolition by EPA would take significantly longer and require me to divert more of our resources away from cleanup (the landfill will also not be available to accept asbestos debris for at least several weeks). Even after this limited cleanup, I would still caution that reasonable protections of workers destroying the attic and walls should be employed to be completely certain of their safety. I say this not to dissuade you from doing the work, but simply to make clear that easily employed, readily available protection should be employed in this situation just as during disturbance of other asbestos containing materials found across the country.

I hope this answers your question as clearly as possible. At your convenience, please let Courtney Zamora know of which options is preferable to you. Courtney or I can be reached through the EPA Information Center at 293-6194.

Sincerely,

A handwritten signature in black ink, appearing to read 'JC', with a stylized flourish extending from the end.

Jim Christiansen  
EPA Project Manager